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**REMARKS**

Prior to the present response, claims 1, 3-7, 9-11, 13-21, and 32-34 were pending in the present application, and remain pending in the present application. Reconsideration and allowance of outstanding claims 1, 3-7, 9-11, 13-21, and 32-34 in view of the following remarks are respectfully requested.

**A. Rejection of Claims 1-7, 9-11, 13-21, and 32-34 under 35 USC §103(a)**

The Examiner has rejected claims 1-7, 9-11, 13-21, and 32-34 under 35 USC §103(a) as being unpatentable over U.S. Patent Number 5,922,065 to Hull, et al. ("Hull") in view of U.S. Patent Number 6,457,173 to Gupta, et al. ("Gupta"). For the reasons discussed below, Applicant respectfully submits that the present invention, as defined by independent claim 1, is patentably distinguishable over Hull and Gupta, either singly or in combination.

Various embodiments according to the present invention, as defined by independent claim 1, relate to decoding very long instruction word (VLIW) packets. Assembly code is provided for each one of a plurality of instructions in a first combination of instructions in a VLIW packet. A template is matched in the VLIW packet to a known template corresponding to one of a plurality of known syntaxes. The plurality of known syntaxes are arranged as a plurality of first level nodes in a tree structure and include programming notation that indicate the end of a particular issue group. Each of a plurality of second level nodes in the tree structure includes a

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combination of instruction types. A plurality of paths extends between node levels, and each node of the plurality of first level nodes and the plurality of second level nodes has a path to a node of a different node level. See, for example, Figure 2 of the present application.

In the present invention, once a resolved packet syntax is determined, the invention proceeds to match every term of the “resolved packet syntax” (for example, A\_inst “;,” A\_inst “;,” A\_inst “++” “;,”) against the syntax associated with each of the 24 first level nodes, i.e. nodes 204, 206, and 208. See, for example, present application, page 26, lines 4-6. Each first level node is associated with a unique syntax. For example, first level node 204 is represented by the programming notation “MIsI” and the unique syntax associated with the programming notation “MIsI” is:

i1 “;,” i2 “;,” i3 “++” “;,”

When the resolved packet syntax (i.e. A\_inst “;,” A\_inst “;,” A\_inst “++” “;,”) is compared to the syntax of node 204 (i.e. i1 “;,” i2 “;,” i3 “++” “;,”), the invention determines whether *every term* of the resolved packet syntax matches a corresponding term in the syntax of node 204 by looking for a “direct match” or an “indirect match” for the respective terms in the resolved packet syntax and the node syntax. See, for example, present application, page 26, lines 12-18. A direct match is when there is an identical match between a term in the resolved packet syntax and a corresponding term in the node syntax at branch level one (i.e. an identical match with a first level node). See, for example, present application, page 26, lines 18-20. An indirect match is when there is no

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identical match with a first level node, but there is an identical match between the term in the resolved packet syntax and the corresponding term in the node syntax at branch levels two, three, or a lower branch level. See, for example, present application, page 26, lines 20-22 and page 27, line 1.

For example, if the first term in the syntax of node 204 is “i1” and the first term in the resolved packet syntax is “A\_inst”, then it is apparent that the first term in the node syntax (i.e. “i1”) is not identical to the first term in the resolved packet syntax (i.e. “A\_inst”) and as such there is no direct match at branch level one. The invention then looks for an indirect match between the first term in the node syntax (i.e. “i1”) and the first term in the resolved packet syntax (i.e. “A\_inst”). To perform this determination, the invention attempts to determine the various instruction types that can be assigned to the term “i1” at branch level two. As seen in Figure 2, each node at branch level two corresponds to a combination of various instructions. Examples of such instruction combinations are “MA”, “IA”, “ILX”, and “ALX”. For example, a node in branch level two corresponding to the instruction combination “MA” leads either to a type M instruction or to a type A instruction in branch level three. Thus, in the present example where the first term in the resolved packet syntax is “A\_inst”, the invention will proceed to look for an indirect match (since no direct match was found at branch level two) in branch level three.

At branch level three, the invention finally determines a match between the node syntax term “i1” and the resolved packet syntax “A\_inst”. The reason is that node 218 at

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branch level three which corresponds to a type A instruction is identical with the resolved packet syntax "A\_inst". Thus, the invention has verified that the first term in the syntax of node 204 (i.e. i1 ";;" i2 ";;" i3 "++" ";;") matches the first term in the resolved packet syntax (i.e. A\_inst ";;" A\_inst ";;" A\_inst "++" ";;"). This match has been an indirect match since there was no match between the respective first terms of the node syntax and the resolved packet syntax at branch level one. Having matched the respective first terms in the node syntax and the resolved packet syntax, the invention will proceed to determine whether the remaining terms in the node syntax and the resolved packet syntax also match.

In contrast, Hull is directed to a processor that utilizes a template field for encoding a set of most useful instructions in a wide-word format. Hull, in table 40 of Figure 4, discloses various combinations of template field encoding and instruction slot mapping. However, Hull does not teach, disclose, or suggest "matching a template in said first composite packet to a known template corresponding to one of a plurality of known syntaxes that includes multiple stop bits that indicate an end of an issue group and provide chaining information, wherein said plurality of known syntaxes are arranged as a plurality of first level nodes in a tree structure..." as required by independent claim 1.

In contrast to the present invention as defined by independent claim 1, Gupta discloses a tree structure (shown in Figure 2 of Gupta) where each of the templates, e.g., template 134 and template 136, "encode the sets of operations that issue concurrently." Gupta, column 12, lines 22-23. Moreover, the encoding done by the

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templates disclosed in Gupta do not use matching techniques since in Gupta, “[e]ach template encodes the cross-product of the operations in each of its slots” based on the concurrency and exclusivity of the operations in an operation group. Gupta, column 13, lines 35-36. Thus, Gupta does not even suggest using “direct” and “indirect” matching of each respective term in the resolved packet syntax and the corresponding term in the node syntax to determine an appropriate template used to encode a VLIW packet, as disclosed in the present invention.

The Examiner, however, states that “it is not clear how cross-products preclude Gupta from being used in a rejection.” Present Office Action, page 13. Furthermore, the Examiner states that: “[t]he tree concept of Gupta is used to show that when you have a template, then you can work down the tree to get the specifics of the instructions that correspond to that template.” Present Office Action, page 13. Applicant respectfully submits that since each template in Gupta encodes the cross-product of the operations in each of its slots and since the super groups (sets of operation groups) are determined using bitvectors, the tree in Gupta cannot decode a VLIW packet by “matching each term in said one of said plurality of known syntaxes against a respective term in a resolved packet syntax using said tree structure” as required by independent claim 1. Moreover, the decoding techniques disclosed in Gupta do not even include determining whether a known template matches the template extracted from the VLIW packet as disclosed in the present invention. Thus, Gupta fails to teach, disclose, or suggest a tree structure which can decode a VLIW packet efficiently by matching known templates and known syntaxes.

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Therefore, the present invention cannot be achieved by combining the disclosures in Hull and Gupta.

For the foregoing reasons, Applicant respectfully submits that the present invention, as defined by independent claim 1, is not taught, disclosed, or suggested by the art of record. Thus, independent claim 1 is patentably distinguishable over the art of record. As such, the claims depending from independent claim 1 are, *a fortiori*, also patentable for at least the reasons presented above and also for additional limitations contained in each dependent claim.

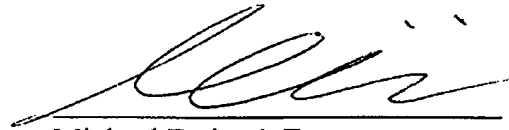
**B. Conclusion**

Based on the foregoing reasons, the present invention, as defined by independent claim 1, and the claims depending therefrom, is patentably distinguishable over the art cited by the Examiner. Thus, outstanding claims 1, 3-7, 9-11, 13-21, and 32-34 are patentably distinguishable over the art cited by the Examiner. As such, and for all the foregoing reasons, an early allowance Notice of Allowance directed to all claims 1, 3-7, 9-11, 13-21, and 32-34 remaining in the present application is respectfully requested.

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Respectfully Submitted,  
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